

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.
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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
CLIFFORD GABEL**

CLIFFORD GABEL, hereby declares and verifies the truth of the following, under penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States Code, Section 1746:

1. I am associated with the firm of Bergman, Bergman, Fields & Lamonsoff, and I am fully familiar with the facts set forth herein.

2. Bergman, Bergman, Fields & Lamonsoff represents Lara Burns in *Burns v. Reith*, Suffolk County Clerk's Index No. 611497/2022. We did not retain IME Companions, LLC to attend Ms. Burns' "Independent Medical Examination" on April 14, 2023. We retained IME Legal Reps.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 16, 2024.


CLIFFORD GABEL